UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

KENNETH LEAR, : Case No. 1:20-cv-04660-GHW

Plaintiff,

DECLARATION OF GREGORY BROWN IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

v.

ROYAL CARIBBEAN CRUISES LTD., d/b/a ROYAL CARIBBEAN INTERNATIONAL, GREGORY BROWN, individually, ROBERT KING, individually, and GRISEL GARCIA RODRIGUEZ, individually

Defendants.

I, GREGORY BROWN, declare as follows:

- 1. I am currently a Lead, Talent Casting for Royal Caribbean Cruises Ltd. ("RCCL"). I submit this declaration in support of Defendants' Motion to Dismiss. This declaration is based upon my personal knowledge of the facts set forth herein, unless otherwise indicated.
 - 2. At all relevant time periods I have resided in the State of Florida.
- 3. The Plaintiff submitted his Casting Profile for review by RCCL's casting team via RCCL's website seeking employment as a singer on one of RCCL's cruise ships.
- 4. At the time Plaintiff was seeking employment with RCCL, I worked as a Casting Assistant. As part of my duties and responsibilities as a Casting Assistant, I corresponded with Plaintiff via telephone and electronic mail in furtherance of his application for employment with RCCL.
 - 5. I have never met Plaintiff in person.
 - 6. I have never traveled to New York to meet with Plaintiff.

7. Plaintiff was provided with a contingent offer of employment pending a pre-employment

physical.

8. If Plaintiff passed his pre-employment physical, he was scheduled to travel to Florida to

commence his employment by engaging in rehearsal.

9. Following rehearsal Plaintiff was to fly to Alaska to board the Radiance of the Seas

where he was to perform for a nine-month period.

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed: Oc

October 23, 2020 Miami, Florida

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